

III. REMARKS

Claims 1-26 remain pending. Claims 1-26 are rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Breslin et al., US 2004/0098285 A1 (Breslin). Applicants have herein amended claims 1, 10 and 18. No new matter is believed added.

Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

With regard to independent claim 1 (and similarly claims 10 and 18), Applicants submit that Breslin fails to teach each and every feature presented in the claim. Initially, Applicants point out that Breslin teaches a system for determining and managing privacy risks within an organization. Breslin does not teach a case management system for managing customer cases. Because Breslin is not even the same type of system, it is difficult to enumerate the many aspects of the claimed invention which Breslin does not disclose. Below, Applicant discusses several of those missing claim elements, all of which illustrate that Breslin does not teach each and every claimed limitation as required by 35 U.S.C. 103(a).

First, Breslin does not teach a system that provides access to customers and support providers. Applicants have amended the claims to clarify that the customers and the support providers are separate and distinct institutions. In the claimed system, a customer can access the Customer Relationship Management (CRM) System when they have a support issue and monitor the status of that issue. On the support provider end, a support provider, that is part of a separate and distinct institution from the customer, can also access the CRM system to provide the necessary support for the customer's issue. In contrast, the Breslin system measures and

monitors the data privacy assessments of applications across an institution, e.g. a corporation. (see, e.g., Abstract). There are no third party customers in Breslin, and no support providers who provide support to a customer with an issue the customer is having.

Secondly, the claimed invention deals with cases that are opened by a customer or an organization because a customer is having an issue with which they need support. This is not equivalent to the Breslin system where privacy risk assessment is done for a particular application. The Office attempts to equate these two different elements by arguing that because the risk assessment process is done for *new* applications, this can be considered a “new case” as recited in the claims. However, the fact that the assessment is done on a new application, does not make the cases of the claimed system equivalent to the assessments done in the Breslin system. As discussed above, the claimed system is directed to managing cases which arise because a third party customer has a customer service issue. This is not equivalent, or even similar, to the Breslin system where an application is assessed to determine if there is a privacy risk, and steps are done to bring the status into compliance.

Thirdly, the claimed invention also includes a compliance tracking system that retrieves previously loaded customer compliance data from a database; wherein the compliance data consists of information related to whether a customer has met certain pre-set goals set by the CRM system. The Office attempts to point to the questionnaire in Breslin that assesses the compliance of a group with requirements of data privacy (including compliance with applicable state and Federal laws). [0012]. Again, this data privacy assessment is not equivalent to the claimed invention’s compliance tracking system. The claimed invention determines whether a third party customer has met certain goals set by the system, i.e., whether a student has taken the requisite courses, or whether a patient has filled the necessary medical prescriptions. In contrast,

Breslin teaches an assessment of whether a particular application complies with data privacy requirements.

Accordingly, for all the reasons discussed above, Applicants submit that Breslin does not teach each and every element of the claimed invention and therefore requests that the rejections be withdrawn.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserves the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

Applicants respectfully submit that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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